

# CORNERSTONE

Environmental Group, LLC

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VIA E-MAIL AND US MAIL

July 5, 2013

RECEIVED  
JUL 10 2013

Mr. Jonathan Gorin  
Remedial Project Manager  
United States Environmental Protection Agency, Region II  
290 Broadway  
19<sup>th</sup> Floor  
New York, New York 10007-1866

Subject: Monthly Progress Report for June 2013  
LCP Chemicals, Inc. Superfund Site (USEPA ID# NJD079303020)

Dear Mr. Gorin:

The following monthly progress report is submitted on behalf of ISP Environmental Services Inc. (IES) in satisfaction of the Section VIII.35 requirements of Administrative Order No. II CERCLA-02-99-2015 (hereinafter referred to as the Order) issued by USEPA and as executed by IES on May 13, 1999.

A "Gantt Chart" project schedule is provided as an attachment (Figure 1). This project schedule provides graphical representations of the project tasks and subtasks. Accordingly, the project schedule depicts the task completion through the end of the reporting month and provides an estimate of the timing of future tasks.

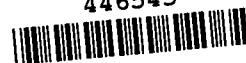
**1. Previous Actions in Compliance with the Order**

A. The following actions have been taken to comply with the Order during the previous month:

- Continued preparation of a revised final *Remedial Investigation Report* (RIR), based on final input from the USEPA on the response to the Agency's comments. A redline version of the RIR is anticipated to be provided to the Agency in early July, to facilitate the final review process.
- A redline version of the *Draft-Final Baseline Ecological Risk Assessment* (Appendix Q to the RIR) was submitted to the USEPA in April, and completion of this portion of the RI is pending USEPA final approval.
- Continued coordination with the USEPA on the *Draft Feasibility Study* (FS), providing input to the Agency for use during the meeting with the National Remedy Review Board (NRRB).

B. The following documents were submitted to the agencies during the previous month:

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- Monthly progress letter report dated June 6, 2013, including an updated project schedule dated May 1, 2013.
- A letter dated June 21, 2013, from John Hoffman of Ashland on behalf of ISPES to Jon Gorin of the USEPA, providing input to the NRRB deliberative review process.

C. The following agency approvals were received during the previous month:

- None during the reporting period.

D. The following agency documents and correspondences were received during the previous month:

- A letter from Jon Gorin of the USEPA to John Hoffman of Ashland, dated June 7, 2013, advising of the opportunity and schedule for providing input to the NRRB.

E. Other pertinent communications with the agencies during the previous month:

- None during the reporting period.

**2. Future Actions, Data, and Plans**

A. The following actions, data, and plans are scheduled to be conducted during the following two (2) months contingent on the USEPA's final approval of the revised RIR and BERA reports and responses to comments on the draft FS report:

- Submit the final *Remedial Investigation Report* for USEPA approval based on any additional comments from the NRRB review process and USEPA's review of the redline RIR which is anticipated to be submitted in early July.
- Prepare the final *Baseline Ecological Risk Assessment* for submittal to the USEPA, following the USEPA's review of the redline version submitted on April 23, 2013.
- Prepare the final FS report for submittal to the USEPA, following the USEPA's review of the response to comments submitted on May 7, 2013, and based on any additional comments resulting from the NRRB review process.
- Continue work to properly dispose of the tank that moved during Hurricane Sandy.

B. Other information related to the progress of work:

- None during this reporting period.

**3. Project Schedule**

A. The percentage of completion of the project subtasks has been updated and is shown on the overall project schedule (Figure 1). Many of the schedule subtask details including the Phase I and Phase II RI field investigations and the treatability study determination process are 100% complete and have been collapsed for presentation brevity on Figure 1. With the submittal to the USEPA of the revised draft RI report and the draft FS report, the schedule is controlled by the USEPA review process. Coordination with the USEPA is ongoing regarding the review process.

Based on the current status of coordination with the USEPA on the RI, BERA, and FS, and the NRRB review process, the schedule has been changed to include the NRRB meeting and pending NRRB memorandum documenting its review process and conclusions. As the time necessary to complete the review process and prepare final RI and FS documents is further defined, the schedule will be updated accordingly.

- B. Delays that have been encountered or anticipated that may affect the future schedule for completion of the work:
- No specific delays are being encountered at this time, and the current schedule reflects the continuation of coordination with the USEPA to finalize the draft RI and FS reports.
- C. Description of efforts made to mitigate these delays or anticipated delays:
- None necessary at this time.

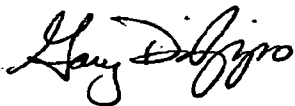
**4. Funding Mechanism**

- A. An Irrevocable Letter of Credit No. P-224827, issued by JP Morgan Bank effective April 25, 2002, and associated Standby Trust Agreement were issued in satisfaction of the financial assurance obligations of the Order as documented to USEPA in a letter from Celeste Wills, Esq. of IES, dated April 26, 2002.

If you or your staff has any questions or comments, please do not hesitate to contact John Hoffman of Ashland Inc. at 302-995-3233.

Sincerely,

**CORNERSTONE ENVIRONMENTAL GROUP, LLC**



Gary J. DiPippo, P.E.  
Manager, Hydrogeology and Remediation

Enclosure

cc: J. Hoffman, Ashland Inc.	C. McGowan, EHS Support
S. Miller, NJDHSS	S. MacMillin, Brown and Caldwell
F. Cardiello, Esq., USEPA	K. Tolson, Geosyntec
D. Toft, Esq.	M. DeFlaun, Geosyntec
A. Pavelka, NJDEP	J. Kubitz, Entrix
R. Lampkin, Ashland	



Figure 1  
RI/FS PROJECT SCHEDULE  
LCP Chemicals, Inc. Superfund Site

